



June 21, 2022

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RE: United Steelworkers comments on EPA's Proposed Rule on "Federal Implementation Plan Addressing Regional Ozone Transport for the 2015 Ozone National Ambient Air Quality Standard" (EPA-HQ-OAR-2021-0668)

To Whom It May Concern:

I write to you on behalf of the 850,000 members of the United Steelworkers union regarding the Environmental Protection Agency's (EPA) proposed Federal Implementation Plan to address regional ozone transport for the 2015 ozone National Ambient Air Quality Standard. Tens of thousands of our members work in utilities, and in the large industries, proposed to be covered by the rule including steel and ferroalloy, glass, cement, chemical, and pulp, paper, and paperboard manufacturing.

Our union strongly supports reasonable and well-researched regulations to ensure that we have clean air and clean water and that communities are protected. Of course, workers inside a facility are the most impacted from exposure to hazardous pollution. However, there will be implications for these industries and for our members' jobs if EPA finalizes a rule that includes certain industrial sources.

We urge EPA to carefully consider the costs and benefits of the proposed requirements for the large industries, including the technological and economic feasibility of implementing controls to reach the identified nitrogen oxide (NOx) emission limits. EPA should consider the overall downwind reductions in NOx from these requirements on particular facilities and industries. To date, EPA declined to publish requirements for industrial sources under the Cross-State Air Pollution Rule because the analyses on emissions showed the lack and uncertainty of the economic feasibility. It is still extremely costly and challenging for these industries to meet the level of emission reductions that the EPA has estimated.

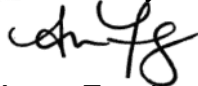
EPA should also avoid finalizing a rule with a timeline and emission limits that would cause facilities to close and lay off workers due to unreasonable current high costs for control technology. The industries in question are trade exposed and must

compete in a global market where cost pressures are significant, particularly given the current global economic changes in recent years from the COVID-19 pandemic to Russia's invasion of Ukraine.

Additionally, we would note that our nation has one of the strongest environmental protection regimes for large industries and we must not incentivize companies to offshore production due to unfeasible requirements. Our union believes that we can continue to make positive and effective change to protect workers and make our communities safer, but we must work together to ensure that regulations to promote environmental stewardship do not create devastatingly heavy burdens.

Our union looks forward to a continued dialogue with EPA to ensure that the requirements under the final rule are protective of human health but also pragmatic for industry. Thank you again for the opportunity to comment.

Sincerely,



Anna Fendley

Director of Regulatory and State Policy